

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ALABAMA

WILLIAM FORESTER,

Plaintiff,

vs.

BAC Home Loans Servicing, L.P. f/k/a)
Countrywide Home Loans Servicing, L.P.)
Et al.,)

Defendants.)

Case No.: CV-11-00160-CB-G

PLAINTIFF'S INITIAL DISCLOSURES

COMES NOW William Forester, Plaintiff in the above-styled cause, by and through his undersigned attorney, and, pursuant to Rule 26(a)(1), makes the following initial disclosures.

- (A) The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings identifying the subjects of the information:

1. **William Forester**
15030 Butler Rd
Wilmer AL 36587
(251) 802-4906

Plaintiff has knowledge of the allegations and claims set forth in the Complaint.

2. **Dana Forester**
809 Morgan Lane
Royersford, PA 19468

Mrs. Forester has knowledge of the allegations and claims set forth in the Complaint.

3. **Jenika Vijendrakumar, a representative of BAC Home Loans Servicing, L.P.**

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

4. Kathryn Shuffield, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

5. Ginger C Rossi, a representative of BAC Home Loans Servicing, L.P.

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6. Erica Rodriquez, a representative of BAC Home Loans Servicing, L.P.

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7. Chirag Rai, a representative of BAC Home Loans Servicing, L.P.

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8. Willard Dulanya, a representative of BAC Home Loans Servicing, L.P.

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9. Hayley Canal, a representative of BAC Home Loans Servicing, L.P.

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10. Vikram Badiani, a representative of BAC Home Loans Servicing, L.P.

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11. Prema Bangera, a representative of BAC Home Loans Servicing, L.P.

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12. Lavanya C, V, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

13. Sharon Cody, a representative of BAC Home Loans Servicing, L.P.

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14. Dana Coleman, a representative of BAC Home Loans Servicing, L.P.

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15. Michele Dias, a representative of BAC Home Loans Servicing, L.P.

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16. Zahid Khakiani, a representative of BAC Home Loans Servicing, L.P.

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17. Sheetal Kolamkar, a representative of BAC Home Loans Servicing, L.P.

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18. Melissa Leslie, a representative of BAC Home Loans Servicing, L.P.

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19. Julie Merrill, a representative of BAC Home Loans Servicing, L.P.

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20. Marjene Moore, a representative of BAC Home Loans Servicing, L.P.

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21. Sylvia Muperno, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

22. Gamaliel Ortiz, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

23. Pramod Pagadkattulu, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

24. Pratibha Pawar, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

25. Sandip Sawant, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

26. Surendra Sharma, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

27. Rohit Upadhya, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

28. Dinesh Yadav, a representative of BAC Home Loans Servicing, L.P.

This person may have information regarding the account and the procedures followed by BAC Home Loan Servicing with regards to the loan modifications and mortgage records.

29. A representative of BAC Home Loans Servicing, L.P.

This person will have information about the mortgage file and procedures followed by BAC Home Loan Servicing with regards to the loan modification and mortgage records.

- (B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

Please see Plaintiff's bates stamped documents.

FORW000001 Bank of America Statement.

FORW000002-40 Loan documents.

FORW000041-43 Promissory Note.

- (C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 of the Federal Rules of Civil Procedure the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, in

- 1. Compensatory damages, including damage to credit, damages by bankruptcy and reputation in an amount to be determined by the court;**
- 2. Compensatory damages, including damages for emotional distress and mental anguish in an amount to be determined by the court;**
- 3. Punitive damages in an amount to be determined by the court;**
- 4. Attorney fees and costs.**

- (D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable to Plaintiff.

DATED this the 4th day of May, 2011.

OF COUNSEL:

UNDERWOOD & RIEMER, P.C.

166 Government Street, Suite 100

Mobile AL 36602

Phone: 251.432.9212

Fax: 251.433.7172

jpatterson@alalaw.com



JAMES D. PATTERSON (PATJ6485)

CERTIFICATE OF SERVICE

I hereby certify that on May 4th, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Kenneth S Steely

Jones, Walker, Waechter, Poitevent, Carrerre & Denegre, LLP

254 State St

Mobile AL 36603



JAMES D. PATTERSON